

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA, *ex rel.*

ANTONI MUHAWI,

Plaintiff,

v.

Case No.: 18-CV-02022
Hon. Manish S. Shah

PANGEA EQUITY PARTNERS,
PANGEA EQUITY PARTNERS, LP,
PANGEA EQUITY PARTNERS II, LP,
PANGEA PROPERTIES,
PANGEA VENTURES, LLC,
PANGEA REAL ESTATE, and
PANGEA REAL ESTATE HOLDINGS, LLC,

Defendants.

JOINT STATUS REPORT

Pursuant to this Court’s May 28, 2025 Minute entry (Dkt. 154), counsel for Antoni Muhawi (“Relator”) and counsel for Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate, and Pangea Real Estate Holdings, LLC (together, “Defendants”) (collectively, the “Parties”) submit this joint status report.

As previously reported to the Court, the Parties, along with the United States, have engaged in substantive and productive settlement discussions and have reached an agreement in principle on most terms of a potential settlement. *See* Dkt. 151. While the parties have reached

agreement on most terms, including settlement amount, they have not yet finalized a settlement. The Parties are still negotiating two issues in the draft settlement agreement between Relator and Defendants relating to the timing of the Defendants' dismissal and attorneys' fees. Relator is also finalizing a term in his agreement with the United States regarding the timing and requirements of dismissal.

In the interests of continuing to conserve resources and allowing the Parties to finalize settlement, the Parties respectfully request that the Court extend the current deadlines by forty-five (45) days, as follows:

- Supplemental depositions to be completed by August 14, 2025; and
- Opening expert disclosures due by September 15, 2025.

The Parties will inform the Court immediately when the settlement is finalized.

Dated: June 26, 2025

HODGSON RUSS LLP

Attorneys for Plaintiff-Relator Antoni Muhawi

By: /s/Patrick E. Fitzsimmons
Robert J. Fluskey (*pro hac vice*)
Patrick E. Fitzsimmons (*pro hac vice*)
The Guaranty Building
140 Pearl Street, Suite 100
Buffalo, New York 14202-4040
716.856.4000
rfluskey@hodgsonruss.com
pfitzsimmons@hodgsonruss.com

HOLLAND & KNIGHT LLP

Attorneys for Pangea Equity Partners, Pangea Equity Partners, LP, Pangea Equity Partners II, LP, Pangea Properties, Pangea Ventures, LLC, Pangea Real Estate and Pangea Real Estate Holdings, LLC

By: /s/Michael A. Grill
Michael A. Gill
Rachel Christine Agius
Holland & Knight
150 N. Riverside Plaza, Ste. 2700
Chicago, IL 60606
(312)263-3600
michael.grill@hklaw.com